

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CYNTHIA SEMBACH,

Plaintiff,

v.

LAKEVIEW LOAN SERVICING, LLC AND
M&T BANK; AND SAFEGUARD
PROPERTIES MANAGEMENT, LLC

Defendants.

Case No. 1:20-CV-00752

Hon. Andrea M. Wood

**DEFENDANT M&T BANK AND LAKEVIEW LOAN SERVICING, LLC'S
UNOPPOSED MOTION TO EXTEND FACT DISCOVERY**

NOW COMES Defendants M&T Bank ("M&T") and Lakeview Loan Servicing, LLC ("Lakeview") (collectively, "Defendants"), by and through their undersigned counsel, and hereby moves this Court for an order extending the fact discovery deadline in this case from March 30, 2021 to July 30, 2021, and, in so moving, state as follows:

1. On January 31, 2020, Plaintiff filed the underlying Complaint (ECF No. 1).
2. On April 22, 2020, Defendants filed a Motion to Dismiss the Complaint (ECF No. 21).
3. On June 10, 2020, Plaintiff filed the instant First Amended Complaint (ECF No. 31).
4. On July 1, 2020, Defendants filed a Motion to Dismiss the First Amended Complaint (ECF No. 37).
5. On July 27, 2020, Defendant Safeguard Properties Management, LLC ("Safeguard") filed a Motion to Dismiss the First Amended Complaint (ECF No. 46).
6. On July 31, 2020, this Court entered a Minute Order setting the fact discovery deadline to March 30, 2021 (ECF No. 49).

7. On November 27, 2020, Plaintiff served Discovery Requests on Defendants and Safeguard.
8. On December 8, 2020, Defendants filed a Motion to Stay Discovery (ECF No. 59).
9. On December 21, 2020, Safeguard filed a Motion of Extension of Time to respond to Plaintiff's discovery requests (ECF No. 60).
10. On December 21, Defendants filed a Motion for Extension of Time to respond to Plaintiff's discovery requests (ECF No. 61).
11. The Motions to Dismiss, Motions for Extension of Time, and Motion to Stay Discovery remain pending before this Court.
12. Defendants now seek an order from this Court extending the fact discovery deadline to July 30, 2021.
13. On January 26, 2021, counsel for Defendants contacted counsel for Plaintiff and counsel for Safeguard regarding concurrence with the instant motion. At that time, counsels for Plaintiff and Safeguard stated they had no objection to the relief sought in the instant motion.
14. This motion is not made for delay, but only to permit orderly resolution of the issues in this case.

WHEREFORE Defendants M&T Bank and Lakeview Loan Servicing, LLC respectfully request that this Court enter an order extending the fact discovery deadline to July 30, 2021, and for such other relief this Court finds just and equitable.

Dated: January 27, 2021

Respectfully submitted,

M&T Bank and Lakeview Loan Servicing, LLC

By: /s/ Punit K. Marwaha

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Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that this motion was electronically filed with the Clerk using the CM/ECF system, which will send a notice of electronic filing to all registered users of the CM/ECF system.

Dated: January 27, 2020

/s/ Punit K. Marwaha
Punit K. Marwaha